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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

BEVERLY SUE MACGREGOR,	)	2:21-cv-00021-CKD
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
vs.	)	
KILOLO KIJAKAZI,	)	
Acting Commissioner of Social Security, <sup>1</sup>	)	
	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a 45-day extension from March 7, 2022 through April 21, 2022 to respond to Plaintiff's Motion for Summary Judgment. Defendant's counsel unexpectedly went out on extended leave for health reasons on February 8, 2022, and has just returned today, March 7, 2022. Defendant's counsel needs the additional time to review the

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<sup>1</sup> Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted, therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 record and draft the responsive motion in this case. This request is made in good faith and with  
2 no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.  
3 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
4

5 Respectfully submitted,

6 Charles E. Binder & Harry J. Binder, LLP

7 Dated: March 7, 2022

8 /s/ Young Bin Yim by Sharon Lahey\*

9 \*As authorized via email on March 7, 2022

10 Young Bin Yim

11 Attorney for Plaintiff

12 Dated: March 7, 2022

13 PHILLIP A. TALBERT

14 United States Attorney

15 PETER K. THOMPSON

16 Acting Regional Chief Counsel, Region IX

17 Social Security Administration

18 By: /s/ Sharon Lahey

19 SHARON LAHEY

20 Special Assistant United States Attorney

21 ORDER

22 APPROVED AND SO ORDERED:

23 Dated: March 8, 2022

24 

25 CAROLYN K. DELANEY

26 UNITED STATES MAGISTRATE JUDGE